

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re

RIVER CITY RENAISSANCE, LC &  
RIVER CITY RENAISSANCE III, LC,

Debtor.

Chapter 11  
(Joint Administration)

Case No. 14-34080-KLP

**MOTION TO APPEAR BY TELEPHONE AT HEARING**

Pursuant to Local Bankruptcy Rule 9013-1, CompassRock Real Estate, LLC (the “Receiver”) hereby respectfully moves for permission for its counsel, **R. Timothy Bryan** (VSB No. 50931) and **Phillip K. Wang** (*pro hac vice* admission pending), to appear telephonically at the hearing scheduled for **October 1, 2013 at 9:00 a.m. (ET)** on, among other matters, the Motion For Entry Of An Order (I) Approving Sale And Bid Procedures; (II) Approving The Form And Manner Of Notice; (III) Approving Broker Compensation; And (IV) Granting Related Relief [ECF No. 97] (the “Sale Procedures Motion”) filed by debtors River City Renaissance, LC, and River City Renaissance III, LC (collectively, the “Debtors”), and the Receiver’s limited objection to the Sale Procedures Motion (“Limited Objection”). In support of this Motion, the Receiver respectfully states as follows:

1. Permitting Messrs. Bryan and Wang to appear telephonically is appropriate given the limited nature of the Receiver’s involvement in these proceedings, and the time and expense involved in requiring Mr. Bryan to travel from Washington DC and Mr. Wang to travel from

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R. Timothy Bryan (VSB No. 50931)  
Phillip K. Wang (*Pro Hac Vice* Pending)

**DUANE MORRIS LLP**

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Attorneys for Receiver COMPASSROCK REAL ESTATE LLC

California to appear in person.

2. Receiver's counsel has conferred with Debtors' attorneys and confirmed they have no objection to this request.

3. The Receiver requests a waiver of Local Bankruptcy Rule 9013-1(G)(1), which requires a separate memorandum of points and authorities to accompany this motion.

WHEREFORE, the Receiver respectfully requests that this Court grant permission to Receiver's counsel to appear by telephone at the upcoming hearing.

Dated: September 30, 2014

Respectfully submitted,

**DUANE MORRIS LLP**

By: /s/ R. Timothy Bryan  
R. Timothy Bryan (VSB No. 50931)  
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Attorneys for Receiver  
COMPASSROCK REAL ESTATE LLC

**CERTIFICATE OF ENDORSEMENT  
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

I hereby certify that the foregoing Motion and Proposed Order has been endorsed by or served, via notice of electronic filing, upon the following parties.

/s/ R. Timothy Bryan

R. Timothy Bryan

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Office Of The U.S. Trustee  
701 E. Broad Street, Suite 4304  
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*Counsel For Chevron U.S.A., Inc.*

**UNITED STATES BANKRUPTCY COURT  
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In re

RIVER CITY RENAISSANCE, LC &  
RIVER CITY RENAISSANCE III, LC,

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Chapter 11  
(Joint Administration)

Case No. 14-34080-KLP

**ORDER GRANTING MOTION TO APPEAR BY TELEPHONE AT HEARING**

THIS MATTER, having come before the Court upon the Motion To Appear By Telephone At Hearing (“Motion”) filed by CompassRock Real Estate, LLC (the “Receiver”), the Court finds that good and sufficient cause exists for the granting of the relief requested in the Motion.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the relief requested in the Motion is hereby GRANTED, and that R. Timothy Bryan and Phillip K. Wang have permission to appear telephonically at the hearing.

Dated: September \_\_\_, 2014

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

Entered on Docket: \_\_\_\_\_

\_\_\_\_\_  
R. Timothy Bryan (VSB No. 50931)  
Phillip K. Wang (*Pro Hac Vice* Pending)

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Attorneys for Receiver COMPASSROCK REAL ESTATE LLC

I ASK FOR THIS:

/s/ R. Timothy Bryan

R. Timothy Bryan (VSB NO. 50931)

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